

February 22, 2006

Via ECFS

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: RM No. 11308
Society of Broadcast Engineers, Inc. ("SBE")
Public Notice Report No. 2750, released January 23, 2006

Dear Ms. Dortch:

Tribune Company, the ultimate owner of 15 television stations across the country that produce local news broadcasts plus a 24 hour/day local cable news channel, by its undersigned attorney, hereby submits these comments in support of the above-referenced SBE Petition for Rulemaking ("Petition"). Included among these Tribune stations are major news operations in New York City (WPIX), Chicago (WGN) and Los Angeles (KTLA).

The SBE Petition proposes to modify the Universal Licensing System ("ULS") and FCC Form 601 to allow TV Pickup licensees to specify the location(s) and height(s) of their electronic news gathering receive only sites ("ENG receive sites"). The Petition requests that Remote Pickup ("RPU") licensees also be allowed to specify the location(s) and height(s) of any RPU receive only sites.

The Commission has recognized time and again that local news broadcasts represent one of the most important ways a television station can serve viewers in its community of license and surrounding television market. Electronic news gathering operations lie at the core of a station's ability to cover the news in its community. Now more than ever, compelling local news broadcasts require the ability to cover late-breaking news with on-the-scene coverage virtually anywhere in a station's market on a moment's notice.

For these reasons, ENG receive sites are placed on tall buildings and/or near the tops of tall towers to increase the likelihood that no matter where a news event occurs in a TV station's coverage area, an ENG truck will have line of sight to at least one ENG receive site. To increase the reach of the ENG trucks and thus enhance the station's ability to cover news in the market, these receive sites have sensitive receivers designed to process very low signal levels.

In several instances over the past ten years, Tribune stations have effectively lost anywhere between 5-15 miles of ENG coverage due to brute force overload caused by a high-powered, adjacent band Personal Communications Service ("PCS") base station sited too close

to the Tribune station's ENG receive site. Given the nature of the remote newsgathering operation, these problems often arise in the first instance in the middle of covering a story. When this occurs, the station's ability to cover the story is compromised. Depending on the location of the site and the other equipment available, the station's ability to cover the news can remain compromised because the functionality of the ENG receive site is severely diminished until special filters can be obtained and installed.

At the moment, PCS licensees cannot avoid creating these problems, at least not systematically, even if they want to because they do not know the locations of these ENG receive sites. Amending the ULS and Form 601 as suggested by SBE to give TV Pickup licensees (and Remote Pickup licensees) the option of entering the locations and heights of their ENG receive sites into the ULS will change this unfortunate situation. If adopted, the location of ENG receive sites will be available in a searchable database, thereby enabling PCS licensees to avoid picking sites too close to these receive sites when designing their networks.

For all these reasons, Tribune supports the SBE Petition, and urges the Commission to issue a Notice of Proposed Rulemaking expeditiously.

Sincerely,

/s/ Thomas Van Wazer /s/

Thomas P. Van Wazer
Counsel for Tribune Company